

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:)	
)	
ALONZO LEE BONNER, SR.)	
SHIRLEY HARRIS BONNER)	
)	Case No. 16-35775-KLP
Debtors)	Chapter 13
)	
WILMINGTON SAVINGS FUND)	
SOCIETY, FSB, ET SEQ.)	
)	
Movant)	
)	
v.)	
)	
ALONZO LEE BONNER, SR., ET AL.)	
)	
Respondents)	

DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY

COMES NOW the Debtors, by counsel, and as and for Debtors' Response to Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as Trustee for Pretium Mortgage Acquisition Trust's ("Movant") Motion for Relief From the Automatic Stay ("Motion"), states as follows:

1. The allegations contained in paragraphs 1, 2, 3, 4, 5, 6, 7 and 11 of the Motion are admitted.

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
Telephone: (804) 225-9500
Facsimile: (804) 225-9598
Email: jkane@kaneandpapa.com
Counsel for Debtors

2. The allegations contained in paragraphs 8, 9, 10, and 12 of the Motion are denied and the Debtors demand strict proof thereof.

3. In support of their denial of the allegations contained in the Motion, the Debtors affirmatively state:

a. At the time of Movant's filing of the Motion, the Debtors were current with their post-petition payments to Movant.

b. The Movant's Motion alleges that the Debtors were post-petition delinquent for periods wherein the Debtors have proof of payment which were provided to the Movant. The Movant has admitted to receiving all of the payments except for one (1) payment which was believed to have been lost in the mail.

c. The Debtors are not liable for this payment nor are they liable for the legal fees as their post-petition payments to the Movant were current at the time of the filing of the Motion.

d. Debtors' counsel made an additional attempt to resolve the matter with Movant and Movant failed and refused to discuss a resolution.

WHEREFORE, the Debtors respectfully request that Movant's Motion for Relief From the Automatic Stay be denied, and for such other relief as the Court deems appropriate.

ALONZO LEE BONNER, SR.
SHIRLEY HARRIS BONNER

By: /s/ James E. Kane
Counsel

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Richmond, VA 23219
Telephone: (804) 225-9500
Facsimile: (804) 225-9598
Email: jkane@kaneandpapa.com
Counsel for Debtors

CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof.

/s/ James E. Kane
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KANE & PAPA, P.C.
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Richmond, Virginia 23219
Telephone: (804) 225-9500
Facsimile: (804) 225-9598
Email: jkane@kaneandpapa.com